

M E M O R A N D U M

April 10, 1979

Site: A.L. Taylor  
Break: 11.85  
Other: Note attached

May 2, memo  
from Kuentop  
on "unknowns"  
to previous  
3/23 inventory

TO: JACK WILSON, Deputy Commissioner  
Bureau of Environmental Protection

FROM: ROBERT L. SHOLAR, Environmental Specialist *RLS*  
Division of Hazardous Material & Waste Management

STEVEN P. SIMS, Environmental Specialist *SPS*  
Division of Hazardous Material & Waste Management

SUBJECT: Records Comparison at the Valley of Drums

Purpose

In order to determine the origin of hazardous waste substances at the Taylor illegal dump site in Bullitt County, and also the extent to which contributing parties are involved, a comparison of records furnished to the Department has been made.

Method

Records provided by five (5) industrial firms in the Louisville area were contrasted with records provided by the Taylor Company, and also with information disclosed by the state inventory at the site. The primary inputs to this report were the industrial records. It should be noted that the Taylor records seem to be incomplete, especially regarding a period of heavy activity - 1975 and 1976.

Data & Conclusions

The data from this study is presented in narrative form (by industry and in descending order of contribution) and is also summarized in tabular form.

The numbers of drums reported are only those for which a strong probability exists that the wastes were disposed of at the illegal dump.

I. Reliance Universal, Inc.

Reliance Universal reports that 7,002 drums were hauled directly from their plant by A. L. Taylor between July 1975 and May 1976. The disposal location of these is not recorded.

George Whitesides reports that 6,299 drums from Reliance Universal were hauled from his solvent recovery plant by A. L. Taylor in 1977 and 1978. The disposal location of these drums is also unrecorded.

Therefore, a total of 13,301 drums from Reliance Universal have a strong probability of disposal at the Taylor Site.

II. Ford Motor Company

Ford reports that a total of 10,105 drums were hauled from their plant by Mr. Taylor between 1975 and 1977.



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Mr. Taylor had indicated to them that full barrels of industrial waste would be disposed of at a permitted landfill, however, a notarized statement from the landfill in question specifies that only empty drums can be accepted.

The disposal location of the drums cannot be substantiated.

### III. George W. Whitesides Company

Whitesides reports that Taylor hauled 3,082 of his waste drums in the 1975 - 1978 period.

Whitesides also discloses that another 6,678 drums were hauled by Taylor during this period, and he contends that these drums originated at various points:

Reliance Universal	
Coatings	5,300
Resins	40
Clinton, Miss.	959
Tremco	200
C & C Supply	98
Guardsman Chemical	67
Randall Vevay	14
	<u>6,678</u>

The disposal site of these is unrecorded.

### IV. Kurfees Coatings

Kurfees reports that 489 drums were released to Taylor, disposal site - unknown.

### V. Louisville Varnish Company

Louisville Varnish reports 33 drums released to Taylor, disposal site - unknown.

Thus, a total of 27,389 drums have a strong probability of occupying the Taylor site. That total is broken down as:

	<u>No. of Drums</u>	<u>Percent of Total</u>
1. Reliance Universal, Inc.	13,301	48.56%
2. Ford Motor Company	10,105	36.89%
3. George W. Whitesides	3,082	11.25%
4. Kurfees Coatings	489	1.79%
5. Tremco	200	.73%
6. C & C Supply	98	.35%
7. Guardsman Chemical	67	.24%
8. Louisville Varnish	33	.12%
9. Randall Vevay	14	.05%

Barrels from five (5) of these nine (9) companies were clearly labeled and identified during the state inventory. Those were:

	No. of Drums
1. Reliance Universal, Inc.	143
2. Ford Motor Company	20
3. George W. Whitesides	3
4. Louisville Varnish	2
5. Guardsman Chemical	1

NOTE: These figures represent clearly labeled drums and are somewhat misleading, particularly in the case of Reliance Universal, Ford, and Whitesides because:

- A) Reliance Universal - The majority of barrels at the site have waste, color, and lot numbers, characteristics of this company, but are not labeled per se.
- B) Ford - Many of the drums at the site are labeled Gage Products (78 drums). These have been claimed, as have a great many unlabeled drums, by Ford Motor Company.
- C) Whiteside - The drums sent out by Whiteside may be expected to bear labels of many different companies and/or be unlabeled.

The generator's disclosures on numbers of drums released to Mr. Taylor reinforce the assumption that these three companies contribute much more than the total "labeled" figure indicates.

Although none of the Kurfee Coatings drums were inventoried, their presence on site has been verified by previous inspections. The presence of barrels on site from the remaining three companies was not substantiated by the inventory. Those companies are:

- 1) Tremco
- 2) C & C Supply
- 3) Randall Vevay

As the attached table indicates, in most cases the Taylor Company's records are unavailable for comparison, and in those cases where comparison is possible, the Taylor records can verify only a portion of the industrial totals.

If the accepted total surface count of barrels at the site is 16,383, one may assume that the balance, 11,006 drums, is a close approximate of the <sup>potential</sup> number drums buried on site.

In addition to drummed waste, Mr. Taylor also hauled five (5) loads of fly-ash, presumably road-bed material, from Ford Motor Company at 550.00 per load.

RLS:SPS/lrw

cc: Daniel Dolan  
Hussein Aldis

TABLE NUMBER 1

	Company Records	Taylor Records	Date
I. Relaince Universal			
Coatings	2,053	N.R.	7/75 - 5/76
Resins	4,949	N.R.	7/75 - 3/76
	<u>7,002</u> Sub-total		
Relaince Universal	6,299	1,800	1977 - 1978
via George W. Whitesides	<u>13,301</u> Total		
(Refer to Item III)			
II. Ford			
	521	N.R.	1975
	5,557	348	1976
	4,027	2,629	1977
	<u>10,105</u> Total		
III. George W. Whitesides			
	133	N.R.	1975
	1,293	N.R.	1976
	1,299	391	1977
	357	233	1978
	<u>3,082</u> Sub-total		
(A) Reliance Universal			
via George W. Whitesides	609	N.R.	1975
Coatings	1,822	N.R.	1976
	1,789	600	1977
	1,080	1,200	1978
	<u>5,300</u>		
Resins	0	N.R.	1975
	40	N.R.	1976
	0	N.R.	1977
	0	N.R.	1978
	<u>40</u>		
Clinton, Miss.	359	N.R.	1975
	160	N.R.	1976
	440	N.R.	1977
	0	N.R.	1978
	<u>959</u>		
	6,299 Sub-total		
(B) Tremco via			
George W. Whitesides	120	N.R.	1975
	80	N.R.	1976
	<u>200</u> Sub-total		
(C) C & C Supply via			
George W. Whitesides	98	98	1977
(D) Guardsman Chemical			
via George W. Whitesides	40	40	1977
	27	N.R.	1978
	<u>67</u> Sub-total		

(E) Randall Vevay  
via George W. Whitesides

14

N.R.

1976

9,760 Total

IV. Kurfees Coating

249

N.R.

1976

240

N.R.

1977

489 Total

V. Louisville Varnish

33

N.R.

10-1977

27,389 Grand Total